



December 10, 2009

Sent via email

**Kelcey Land
U.S. Environmental Protection Agency
Region 8, 8ENF-T
999 18th Street, Suite 300
Denver, Colorado 80202-2466**

RE: Progress report for November 2009 activities - Hecla Mining Company Apex Site (EPA ID No. UT982589848, Docket No. RCRA-8-99-06)

Dear Kelcey:

Per paragraph 64 of the Order, enclosed is a copy of the November 2009 progress report for your records.

If you have any questions please do not hesitate to call me at (208) 769-4112 or e-mail at pglader@hecla-mining.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "P. Glader", written over a horizontal line.

**Paul L. Glader
Manager Environmental Services**

Encl

Cc: HMC Legal Dept (w/o attachments)



December 10, 2009

Sent via U.S. Mail

**Glenn Rogers, Chairman.
Shivwits Band of Paiute Indian Tribe
6060 West 3650 North
Ivins, Utah 84738**

**John Krause
Bureau of Indian Affairs
400 North 5th Street, Floor 12
Phoenix, AZ 85004**

**Kelly Youngbear
BIA Southern Paiute Agency
P.O. Box 720
St. George, UT 84771**

**RE: Progress report for November 2009 activities - Hecla Mining Company Apex
Site (EPA ID No. UT982589848, Docket No. RCRA-8-99-06)**

Dear Chairman Rogers, Mr. Krause and Ms. Youngbear:

**Per paragraph 64 of the Order, enclosed is a copy of the November 2009 progress
report for your records.**

**If you have any questions please do not hesitate to call me at (208) 769-4112 or e-
mail at pglader@hecla-mining.com.**

Sincerely,

A handwritten signature in blue ink, appearing to read "P. Glader", written over a horizontal line.

**Paul L. Glader
Manager Environmental Services**

Encl

**Cc: HMC Legal Dept. (w/o attachments)
Kelcey Land (USEPA, Region VIII) (w/o attachments)**



December 10, 2009

MEMORANDUM TO: Apex File

COPIES TO: distribution

FROM: Paul Glader

SUBJECT: Progress Report No. 67 for period ending November 30, 2009; Pond 2 Final Closure - Apex Site, Washington County, Utah

Summary

The monthly visual inspection, per the long term monitoring plan, was conducted on November 21. No unusual conditions were noted.

Geotechnical Monitoring

Based on the data showing that the facility has experienced consistently low settlement rates over the past three years, Hecla will continue to monitor the facility, however with survey data being collected on an annual basis.

The settlement monitors were surveyed on August 17, 2009. No appreciable movement was noted. MEI prepared a Surface Monument Survey Data Review. Based on surface monitoring survey data collected from January 2006 through August 2009:

- Overall settlement of the reclaimed impoundment top surface continues to be very minor
- Settlement rates continue to slightly decrease

Work Planned for Next Period

Visual inspection of site

Cost and Schedule

Committed costs in November 2009 were \$176. Total project to date committed cost is approximately \$1,475,000.

Supplemental Attachments

November 2009 site inspection report

November 2009 cost report

Annual Site Inspection Summary Sheet - Apex Site - Pond 2

Hecla Mining Company - Long-Term Maintenance and Monitoring Plan

Form 1 of 4 - Summary

| Date: <u>11/21/09</u> | | | |
|--|---|---|---|
| Inspector: <u>D. Trueman</u> | | | |
| Cover System Component | Potential Problem | Allowable Limits | Limits Potentially Exceeded |
| Site Perimeter | Erosion or Fencing Issues | NA | NA |
| Cover System (outslopes, top, rock) | Subsidence | Minor: ponding < 1" some gullyng / erosion | Yes ___ * No <input checked="" type="checkbox"/> |
| | | Significant: see Table 2 | Yes ___ * No <input checked="" type="checkbox"/> |
| | Embankment Slope Stability | excessive movement or surface cracks > than 1" | Yes ___ * No <input checked="" type="checkbox"/> |
| | Gullyng | on top | depth > 1" Yes ___ * No <input checked="" type="checkbox"/> |
| | | at embankment crest or on outslope | depth > 2" Yes ___ * No <input checked="" type="checkbox"/> |
| | | w/in normal flow channel in diversion channel | no gullyng allowed Yes ___ * No <input checked="" type="checkbox"/> |
| | | w/in diversions at toe of impoundment outslope | no gullyng allowed Yes ___ * No <input checked="" type="checkbox"/> |
| | | in diversion channel at any other location | NA NA |
| | Erosion Protection Stability | rock subsiding or missing | Yes ___ * No <input checked="" type="checkbox"/> |
| | Seepage | no colored seepage allowed (red, blue, yellow w/ crystallization) | Yes ___ * No <input checked="" type="checkbox"/> |
| Runoff Control System | Diversion Channel | rock in place, channel not moving, fence stable | Yes <input checked="" type="checkbox"/> * No ___ |
| | Diversion Swales | rock in place, no silting in or head cutting | Yes <input checked="" type="checkbox"/> * No ___ |
| | Excessive silt build up at fence lines in diversion channel | allowed if not effecting cover system | Yes ___ * No <input checked="" type="checkbox"/> |

* Mark all areas of concern or requiring repairs on attached site map.

Annual Site Inspection - Apex Site - Pond 2

Hecla Mining Company - Long-Term Maintenance and Monitoring Plan

Form 2 of 4 - Site Perimeter

| | |
|--|---------------------------|
| Inspection Date: <u>11/21/09</u> | |
| Inspector: <u>D. Tramm</u> | |
| Visible Outlying Areas | |
| Observed Condition: | <u>Things Look Normal</u> |
| Observed Damage: | <u>None</u> |
| May require repair: Yes ___ * No <input checked="" type="checkbox"/> | |
| Property Boundary Fence and Gate (walk fence line) | |
| Observed Condition: | <u>IM Good Repair</u> |
| Observed Damage: | <u>None</u> |
| Potential Corrective Actions: | <u>None</u> |
| May require repair: Yes ___ * No <input checked="" type="checkbox"/> | |
| All Upgradient Areas (areas that drain onto property) | |
| Observed Condition: | <u>No Change</u> |
| Observed Damage: | <u>None</u> |
| May require repair: Yes ___ * No <input checked="" type="checkbox"/> | |

* Mark all areas of concern or requiring repairs on attached site map.

Hecla Mining Company - Long-Term Maintenance and Monitoring Plan

Form 3 of 4 - Impoundment

Inspection Date: 11/21/09Inspector: P. J. [signature]

Outslopes

Observed
Performance:

Rock Cover Subsidence:

Yes ☐ No ☒May require repair: Yes ☐ * No ☒Excessive Slope Movement (failure): Yes ☐ No ☒May require repair: Yes ☐ * No ☒Gully Development: Yes ☐ No ☒May require repair: Yes ☐ * No ☒Observable Leachate (colored): Yes ☐ No ☒May require repair: Yes ☐ * No ☒Excessive Siltation (at slope toe): Yes ☐ No ☒May require repair: Yes ☐ * No ☒Observed
Damage:Potential
Corrective
Actions:

Top (top surface soils)

Observed
Performance:

Cracking (>1" width):

Yes ☐ No ☒May require repair: Yes ☐ * No ☒Settlement / Evidence of Ponding: Yes ☐ No ☒May require repair: Yes ☐ * No ☒Erosion / Gullyng: Yes ☐ No ☒May require repair: Yes ☐ * No ☒Observed
Damage:No changePotential
Corrective
Actions:none

Erosion Protection Layer (rock)

Observed
Performance:

Rock Staying in Place:

Yes ☒ No ☐May require repair: Yes ☐ * No ☒Rock Subsiding: Yes ☐ No ☒May require repair: Yes ☐ * No ☒Missing Rock: Yes ☐ No ☒May require repair: Yes ☐ * No ☒Observed
Damage:Rock is staying in placePotential
Corrective
Actions:none

MARK all areas of concern or requiring repairs on attached site map.

Annual Site Inspection - Apex Site - Pond 2

Hecla Mining Company - Long-Term Maintenance and Monitoring Plan

Form 4 of 4 - Diversion Channel and Swales

| | | | |
|---|-------------------------------|---|---|
| Date: <u>11/21/09</u> Inspector: <u>D. [Signature]</u> | | | |
| Diversion Channel | | | |
| Observed Performance: | Erosion Protection in place: | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> | May require repair: Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/> |
| | Normal Flow Channel in place: | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> | May require repair: Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/> |
| | Encroaching on Site Fencing: | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | May require repair: Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/> |
| Observed Damage: <u>NONE</u> | | | |
| Potential Corrective Actions: <u>NONE</u> | | | |
| Diversion Swales | | | |
| Observed Performance: | Erosion Protection in place: | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> | May require repair: Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/> |
| | Flow Channel Silting In: | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | May require repair: Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/> |
| | Head Cutting: | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | May require repair: Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/> |
| Observed Damage: <u>NONE</u> | | | |
| Potential Corrective Actions: <u>NONE</u> | | | |

* Mark all areas of concern or requiring repairs on attached site map.

| Activity | 2004 Budget | Revised Budget May 2004 | Committed Cost this Period | Cumulative Committed Cost To Date 11-30-09 | Forecasted Cost To Complete | Forecasted Final Cost | Remarks on Forecast to Complete |
|--|----------------|-------------------------------|----------------------------------|---|-----------------------------------|--------------------------|--|
| Phases I through III <i>(Completed February 2006)</i> | | | | | | | |
| Phase I - Drain Excess Liquid From Tailings | 189,200 | 72,700 | | 67,928 | 0 | 67,928 | |
| Phases II, IIA + IIB - Evaporate Excess Liquid | 6,000 | 8,000 | | 242,882 | 0 | 242,882 | |
| Phase III - Regrading & Final Cover System | 337,000 | 342,050 | | 504,742 | 0 | 504,742 | |
| Field Indirect Costs | 164,500 | 213,568 | | 378,517 | 0 | 378,517 | Includes Jan + Feb 2006 long term monitoring costs |
| Hecla Costs | 18,700 | 18,700 | 0 | 33,324 | 0 | 33,324 | |
| Subtotal Phases I through III | 715,400 | 655,018 | 0 | 1,227,393 | 0 | 1,227,393 | |
| Long Term Monitoring <i>(through FY 2010)</i> | | | | | | | |
| Site Inspections | | | 176 | 189,991 | 4,722 | 194,713 | |
| Settlement Monitoring | | | | 8,775 | 1,650 | 10,425 | |
| Consultant Support: | | | | | | | |
| Annual Geotechnical Engineer Inspections | | | | 2,495 | 18,100 | 20,595 | Includes settlement monitoring data analysis |
| Vegetation Monitoring | | | 0 | 0 | 20,000 | 20,000 | Allowance for surveys in FY 2008 - 2010 |
| Site Conditions Review - MEI | | | 0 | 7,669 | 2,132 | 9,801 | |
| Site Conditions Review - SVL Analytical | | | 0 | 2,079 | | 2,079 | |
| Erosion Repair Review - MEI | | | | 2,927 | 573 | 3,500 | |
| Revegetation Review - Bamberg | | | | | 3,500 | 3,500 | |
| Maintenance: | | | | | | | |
| Erosion Repair Allowance | | | | 21,941 | 7,500 | 29,441 | Erosion repair conducted April 2008 |
| Revegetation Allowance | | | | 9,912 | 10,000 | 19,912 | Revegetation conducted April 2008 |
| Hecla Project Management Costs: | | | | | | | |
| Labor | | | 0 | 2,266 | 7,909 | 10,175 | |
| Travel expenses | | | 0 | 0 | 1,312 | 1,312 | |
| Subtotal Long Term Monitoring | 0 | 0 | 176 | 248,055 | 77,398 | 325,453 | |
| Total Pond 2 Final Closure | 715,400 | 655,018 | 176 | 1,475,448 | 77,398 | 1,552,846 | |